## Case 3:24-cv-01098-ZNQ-TJB Document 331 Filed 07/14/25 Page 1 of 2 PageID:

WEISSMAN<sup>47</sup>& MINTZ LLC

STEVEN P. WEISSMAN WILLIAM G. SCHIMMEL. IRA W. MINTZ FLAVIO L. KOMUVES JASON L. JONES JUSTIN SCHWAM PATRICIA A. VILLANUEVA DEREK J. DEMERI

Senior Counsel KEVIN P. MCGOVERN

Of Counsel ROSEMARIE CIPPARULO BRETT M. PUGACH YAEL BROMBERG ATTORNEYS AT LAW
220 DAVIDSON AVENUE
SUITE 410
SOMERSET, NEW JERSEY 08873
(732) 563-4565
FAX (732) 560-9779
www.weissmanmintz.com

90 BROAD STREET SUITE 254 NEW YORK, NEW YORK 10004 (212) 509-0918

Counsel DAVID A. MINTZ\*

\* ADMITTED TO PRACTICE ONLY IN NEW YORK

JOEL N. WEISSMAN (1957-1998) MARK ROSENBAUM (1955-2002)



July 14, 2025

## Via ECF

Hon. Zahid N. Quraishi
United States District Judge
Clarkson S. Fisher Federal Building &
United States Courthouse
402 East State Street
Trenton, NJ 08608

Re: Conforti v. Hanlon, Civil Action No. 3:20-cv-08267-ZNQ-TJB Kim v. Hanlon, Civil Action No. 3:24-cv-01098-ZNQ-TJB

## **Request for Oral Argument on Motions for Reconsideration**

Dear Judge Quraishi:

Pursuant to Local Civil Rule 78.1(b), Plaintiffs respectfully request that the Court hear oral argument on Plaintiffs' and Defendants' Motions for Reconsideration (Kim ECF Nos. 324, 325; Conforti ECF Nos. 256, 257), both of which are currently returnable on July 21, 2025.

We believe that oral argument would aid the Court in addressing the complex and interrelated legal issues arising in *Conforti* and *Kim*. These include the questions of the ability of Plaintiffs to obtain final relief following a determination that its claims are not moot, the procedural options for proceeding with the case in light of the New Ballot Design Law, P.L. 2025, c.32, mootness and its exceptions, and the *Friends of the Earth* doctrine, its progeny, and its application to these facts. These issues involve nuanced constitutional and statutory interpretation and interplay with one another and would benefit from elaboration by counsel and by clarifying questions from the Court.

I am authorized to state that counsel for Bergen and Hudson Counties both join in this request.

If the Court grants this request, I am available to work with Chambers to coordinate all scheduling with opposing counsel.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

WEISSMAN & MINTZ LLC

BROMBERG LAW LLC

/s/ Brett M. Pugach

Brett M. Pugach

/s/ Yael Bromberg

Yael Bromberg

/s/ Flavio L. Komuves

Flavio L. Komuves

cc: All Counsel (via ECF)